

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF TENNESSEE**  
**AT NASHVILLE**

<b>PEGGY DUNCAN MATHES,</b>	)	
<b>Administrator of the Estate of</b>	)	
<b>ROY GLENN HALL, JR.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	
<b>METROPOLITAN GOVERNMENT OF</b>	)	<b>No. 3:10-00496</b>
<b>NASHVILLE and DAVIDSON COUNTY,</b>	)	<b>Judge Aleta A. Trauger</b>
<b>TENNESSEE; DAVIDSON COUNTY</b>	)	
<b>SHERIFF'S OFFICE; CORRECT CARE</b>	)	<b>JURY DEMAND</b>
<b>SOLUTIONS, LLC; OFFICER SCOTT</b>	)	
<b>ARNOLD; OFFICER LAMONDO</b>	)	
<b>BROWN; OFFICER ELSIE NOEL;</b>	)	
<b>RAPHAEL CRAWFORD, LPN; TONJA</b>	)	
<b>CALDWELL, LPN; AMANDA</b>	)	
<b>MONROE, LPN; CINDY ENSLEY, LPN;</b>	)	
<b>and JEAN GRAVES, LPN,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION TO AMEND INITIAL CASE MANANGEMENT ORDER**

Come now the parties, and respectfully submit this Joint Motion to Amend the Initial Case Management Order. In support of this Motion, the parties would state that a Scheduling Order has been filed in a related action currently pending in the Davidson County Circuit Court. The parties request that the deadlines in this case be modified to mirror the deadlines set forth in the Scheduling Order in the Circuit Court case. Specifically, the parties request that the Initial Case Management Order be modified as follows:

- Fact discovery is to be completed by June 29, 2011;
- Plaintiff shall disclose all experts with reports by July 29, 2011;
- Defendants shall disclose all experts with reports by August 29, 2011;

- Plaintiff shall make her experts available for depositions by September 29, 2011;
- Defendants shall make experts available for depositions by October 29, 2011
- All dispositive motions are to be filed by November 29, 2011.
- A Joint Mediation Report shall be filed with the Court by November 1, 2011.

WHEREFORE, based on upon these reasons, the parties request that the Court grant this motion and enter an Order Amending the Initial Case Management Order extending the deadlines as set forth above.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this the \_\_\_\_\_ day of \_\_\_\_\_, 2011, a copy of the foregoing document, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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